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June 1, 2022

VIA ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk/Executive Director
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29211

RE: Public Service Commission of South Carolina - Administrative and
Procedural Matters
Docket No. 2005-83-A

Procedural Schedule for the Integrated Resource Plans (IRP's) Filed
with the Public Service Commission
Docket No. 2022-162-E

Dominion Energy South Carolina, Inc.'s 2023 Avoided Cost Proceeding
Pursuant to S.C. Code Ann. Section 58-41-20(A)
Docket No. 2023-15-E

Duke Energy Carolinas, LLC's 2023 Avoided Cost Proceeding Pursuant
to S.C. Code Ann. Section 58-41-20(A)
Docket No. 2023-16-E

and

Duke Energy Progress, LLC's 2023 Avoided Cost Proceeding Pursuant
to S.C. Code Ann. Section 58-41-20(A)
Docket No. 2023-17-E

Dear Ms. Boyd:

Dominion Energy South Carolina, Inc. ("DESC" or "Company") appreciates the opportunity to provide comments in response to the proposed procedural schedules regarding Integrated Resource Plans Proceedings, Avoided Cost Proceedings, and other Procedural Schedules. In addition to its comments below, please accept this letter as confirmation that counsel for DESC will appear and participate at the workshop scheduled for June 15, 2022, at 2:00 p.m.

(Continued...)

DESC’s 2023 Integrated Resource Plan (“2023 IRP”). Commission Staff proposes that the Company file its 2023 IRP by January 30, 2023. DESC has no objection to the Commission Staff’s proposed filing deadline. Therefore, DESC will file its 2023 IRP no later than January 30, 2023. According to the Company’s calculations, the Commission will have until November 26, 2023, to issue a final order approving, modifying, or denying the Company’s 2023 IRP.¹ See S.C. Code Ann. 58-37-40(C)(1) (2015)(“No later than three hundred days after an electrical utility files an integrated resource plan, the commission shall issue a final order approving, modifying, or denying the plan filed by the electrical utility.”).

The Commission Staff also proposes that the Commission commence a public hearing regarding DESC’s 2023 IRP on July 10, 2023. For the reasons set forth below, DESC respectfully requests that the proposed July 10 hearing date be extended until August 21, 2023.

At present, Commission Staff is proposing that DESC’s 2023 IRP public hearing commence on July 10, 2023, and then shortly thereafter commence DESC’s 2023 Avoided Cost public hearing on July 31, 2023. The Company anticipates substantial involvement from multiple parties in its 2023 IRP proceeding, and it will devote a substantial amount of time and resources to this proceeding. For the most part, the Company personnel who prepare and testify in support of DESC’s IRP are the same personnel who will also prepare and testify in support of DESC’s Avoided Cost calculations and related matters. Like its projection for the 2023 IRP proceeding, the Company anticipates substantial participation from multiple parties in its 2023 Avoided Cost proceeding. For DESC to properly and adequately prepare for both proceedings, there must be sufficient time between each proceeding. Unfortunately, the current proposed schedule of only two weeks between the IRP public hearing and the Avoided Cost public hearing does not provide sufficient time for DESC to adequately prepare for its Avoided Cost public hearing.

To address this issue, DESC has reviewed the calendar attached to the Notice of Forum and the statutory deadlines imposed upon the Commission and has concluded that the commencement of the DESC Avoided Cost public hearing should be advanced from July 31, 2023, to July 10, 2023, and that the DESC IRP public hearing should be extended from July 10, 2023, to August 21, 2023. This will allow DESC sufficient and adequate time to prepare for both public hearings.

¹ Please be advised that November 26, 2023, falls on a Sunday.

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After DESC files its 2023 IRP on January 30, 2023, the Commission will have until November 26, 2023, to issue its final order regarding the Company's 2023 IRP. By commencing the IRP public hearing on August 21, 2023, and assuming that the hearing will last approximately one week, the Commission will have approximately three months after the hearing concludes to issue its final order ruling on DESC's 2023 IRP.

Based on the foregoing, DESC respectfully requests that the public hearing on its 2023 IRP commence on August 21, 2023.

DESC's 2023 Avoided Cost Filing. Commission Staff proposes that DESC file its 2023 Avoided Cost Application by March 6, 2023. DESC has no objection to the Commission Staff's proposed application filing deadline.

With respect to the public hearing, Commission Staff proposes that DESC's Avoided Cost hearing begin on July 31, 2023. For the reasons stated above in its comments on the 2023 IRP hearing date, DESC respectfully requests that its Avoided Cost hearing be advanced from July 31, 2023, and commence on July 10, 2023.

By law, the Commission has until November 15, 2023, to issue its decision in the DESC Avoided Cost proceeding. By advancing the Avoided Cost hearing date to July 10, 2023, the remaining components of the Commission Staff's proposed Avoided Cost schedule do not need to be disturbed and, assuming that the Avoided Cost public hearing lasts one week, the Commission will have approximately eighteen weeks to issues its decision.

Summary of DESC's proposal for its 2023 IRP and Avoided Cost Proceedings. For ease of reference, below is table depicting the Commission Staff's proposed dates for the 2023 IRP and Avoided Cost proceedings and DESC's response.

2023 Proceeding	Commission Staff Recommendation	DESC Response	DESC Proposed Date	Commission Deadline for Ruling
IRP	Filing Date January 30, 2023	No objection	n/a	Nov. 26, 2023
IRP	Hearing Date July 10, 2023	Adjustment Required	Aug. 21, 2023	
Avoided Cost	Filing Date March 6, 2023	No objection	n/a	Nov. 15, 2023
Avoided Cost	Hearing Date July 31, 2023	Adjustment Required	July 10, 2023	

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DESC's 2023 Fuel Hearing. As previously stated in its letter dated May 12, 2022, filed in Docket No. 2005-83-A, the Company does not object to the public hearing commencing on March 30, 2023, regarding its annual review of base rates for fuel costs.

Commission Opens Electric Vehicle Docket. According to the calendar attached to the Notice of Forum, it appears that Commission Staff proposes to open an electric vehicle docket on March 30, 2023. Assuming that the Commission's action is in response to S.C. Code Ann. § 58-27-265, this statute prohibits the Commission from opening a docket for the purpose of identifying regulatory challenges and opportunities associated with the electrification of the transportation section any earlier than April 1, 2023. If DESC's assumptions are correct, then the Company would suggest opening an electric vehicle docket on April 1, 2023, or later.

DESC's 2023 Purchased Gas Adjustment Hearing. As previously stated in its letter dated May 12, 2022, filed in Docket No. 2005-83-A, the Company does not object to the public hearing commencing on November 2, 2023, regarding the annual review of the purchased gas adjustment and gas purchasing policies of DESC.

DESC's 2023 Gas Rate Case Filing. Commission Staff appears to question whether the Company intends to file a general rate case proceeding regarding its natural gas operations by March 31, 2023. By Order No. 2020-701, dated October 14, 2020, issued in Docket No. 2020-6-G, the Commission approved a Settlement Agreement between DESC and the South Carolina Office of Regulatory Staff whereby DESC agreed to, among other things, file a retail natural gas general rate case proceeding with the Commission no later than April 1, 2023. DESC has not yet established the date it intends to file its application, but the Company will comply with its obligation under the settlement agreement and the Commission order approving it.

Thank you for the opportunity to provide you with the Company's written comments regarding these matters. We look forward to meeting with you on June 15, 2022, to discuss this matter further.

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If you have any questions or concerns, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in blue ink, appearing to read "K. Chad Burgess", enclosed in a thin black rectangular border.

K. Chad Burgess

KCB/tmh

cc: All parties of record
(via electronic mail)